APPENDIX A

STATEMENT OF WORK
FOR
REMEDIAL INVESTIGATION AND FEASIBILITY STUDY

QUENDALL TERMINALS
RENTON, WASHINGTON

7 August 2006

I. PURPOSE

The purpose of this Statement of Work (SOW) is to fully implement the Administrative Settlement Agreement and Order on Consent (Settlement Agreement) and the Coordinate and Participate Unilateral Administrative Order ("UAO") for the Remedial Investigation (RI) and Feasibility Study (FS) of the Quendall Terminals Superfund Site (Quendall Site) in Renton, Washington.

All deliverables required by the Settlement Agreement, this SOW and other EPA approved plans shall be performed by Respondents and submitted by Respondents to EPA for review and approval as set forth in Section X of the Settlement Agreement. All deliverables are subject to approval by EPA. All work performed by the Respondents under this SOW must be performed in accordance with an EPA approved plan.

The Work to be completed under this SOW shall include preparation, delivery of and implementation of:

1) Draft and Final Site Control and Access Plan;
2) Draft and Final Summary of Existing Information and Data Quality Report;
3) Draft and Final Preliminary Conceptual Site Model, Preliminary Remedial Action Objectives Technical Memorandum, Preliminary Remediation Goals and Data Gaps Technical Memorandum;
4) Draft and Final Preliminary Classification of Remedial Alternatives and Technologies Technical Memorandum;
5) Draft and Final Information and Data Collection Work Plan, if necessary;
6) Draft and Final Candidate Early Actions Technical Memorandum;
7) Draft and Final Remedial Investigation Report;
8) Draft and Final Baseline Ecological and Human Health Risk Assessment Work Plan;
9) Draft and Final Baseline Ecological and Human Health Risk Assessment;
10) Draft and Final Remedial Alternatives Screening Technical Memorandum;

11) Draft and Final Feasibility Study; and
12) Community Involvement Activities.

The work shall be completed in accordance with the Schedule for Major Deliverables Schedule included below in Section III. The goal of this SOW is to complete a RI/FS which would ultimately result in a Record of Decision on the Quendall Site.

II. WORK TO BE PERFORMED BY RESPONDENTS

Respondents shall complete the following tasks:

Task 1 -- Site Control and Access Plan and Implementation

Respondents shall prepare a Site Control and Access Plan (Plan) for controlling unauthorized access to the Quendall Superfund site as needed to protect human health. The Plan shall also include a schedule for implementing the Plan. Unauthorized access includes anyone who accesses the Site for purposes other than to perform employment-related activities as an employee of the Respondents or their lessees or government personnel performing activities associated with their responsibilities. The Plan shall evaluate the potential for unauthorized access to occur (including possible trespassers interested in fishing, swimming or boating in the waters off the Quendall Site uplands), whether such unauthorized access poses a risk to human health and to the extent a risk is identified, address how Respondents will control such unauthorized access to the Quendall Superfund Site. Scheduled improvements on adjacent properties will be evaluated and taken into account in developing an appropriate Plan.

After EPA approves the Plan, the Respondents shall implement the Plan according to the schedule attached to the approved Plan.

Task 2 B Summary of Existing Information and Data Quality Report

Respondents shall prepare a report which summarizes existing information and evaluates the quality of the data. The data presented in this report will include that data and information collected during previous investigations and evaluations.

The Summary of Existing Information and Data Quality Report shall include, at a minimum, the following elements:

I. Introduction/Purpose

II. A comprehensive description and presentation of all analytical data available for all Quendall Site environmental media (surface water, groundwater, sediment, surface and subsurface soils).

III. Review of the quality of all available sediment, surface and groundwater, surface and subsurface soil data (including data age and relevance to current conditions, analytical methods used, detection limit adequacy, data validation methods and results, and other data limitations and/or strengths) to support the following: (1) an understanding of the nature and extent of surface water, groundwater, sediment, surface and subsurface soil and biota contamination, (2) identification of sources to the upland and aquatic environments, (3) general discussions of

contaminant fate and transport, (4) evaluation of baseline environmental and human health risk, and (5) evaluation of alternative remedial measures for the Quendall Site. The review will include a discussion, with supporting rationale, of media data that are deemed adequate to support RI, risk assessment and FS activities and those data which are not. This review should support the (later) identification of data gaps for the Site.

IV. Other information (including aerial maps, GIS maps blueprints and figures) as necessary to gain a complete understanding of the Quendall site. Data management protocols will be included as an appendix to the existing data summary. All data should be provided to EPA in a Microsoft Office Access compatible database or another data base, if specified by EPA such as Equis (EarthSoft). For each figure, if requested by EPA, all shapefiles and layers used to create that figure should be identified and submitted to EPA.

Task 3 -- Preliminary Conceptual Site Model, Preliminary Remedial Action Objectives, Preliminary Remediation Goals, and Data Gaps Technical Memorandum.

A Technical Memorandum (TM) will be developed that includes the development of a preliminary Conceptual Site Model (CSM), an assessment of Preliminary Remedial Action Objectives (RAOs), development of preliminary remediation goals (PRGs), and an identification of data gaps. Each of these elements will be addressed in the TM as follows:

I. **Preliminary Conceptual Site Model.**

Information on the waste sources, pathways, and receptors at the site will be used to develop a conceptual understanding of the site to evaluate potential risks to human health and the environment. The CSM should include known and suspected sources of contamination, types of contamination and affected media, known and potential routes of migration, exposure media and known or potential human and environmental receptors. This effort, in addition to assisting in identifying locations where additional sampling may be necessary to support the RI/FS, will also assist in the identification of potential remedial technologies. Additional information for evaluating exposure concerns through the use of a conceptual model is provided in the *DQO Guidance*.

The preliminary CSM for the ecological risk assessment (ERA) will include species and their habitats that could be impacted by site-related contamination based on information identified in the *Summary of Existing Information and Data Quality Report* and will show the relationships among species, exposure media and potential exposure pathways. The preliminary CSM for the human health risk assessment (HHRA) will include all potential exposure pathways that address current and potential future exposure conditions at the site (adults, children as applicable), including industrial, residential and recreational exposures. Tribal resource uses will also be included and evaluated.

II. Development of Preliminary Remedial Action Objectives (RAOs)

Based on the existing site information preliminary RAOs will be developed. The preliminary RAOs will specify contaminants and media of interest, exposure pathways, and preliminary remediation goals that permit a range of treatment and containment options to be developed. The RAOs identified by Respondents will include a range of broadly defined potential RAOs and associated technologies and be consistent with CERCLA, the NCP, and

EPA interpretive guidance. The range of potential alternatives will encompass, where appropriate, alternatives in which treatment significantly reduces the toxicity, mobility, or volume of the waste; alternatives that involve containment with little or no treatment; alternatives that include removal of waste, and a no-action alternative. Respondents will include, as appropriate, excavation, dredging, capping, in-situ treatment, in-situ stabilization, in-situ containment, monitored and enhanced natural attenuation, and other alternatives (as well as combinations of each where called for) in the range of alternatives, and this analysis will be included in the RAO analysis.

The RAO analysis will also include a preliminary identification of potential state and federal ARARs (chemical-specific, location-specific, and action-specific), in accordance with the NCP, to assist in the refinement of RAOs. Respondents will also identify other advisories, criteria, guidance, and other "to be considered" initiatives. Respondents will update this ARAR identification during implementation of the Settlement Agreement as Site conditions, contaminants of concern, and RAOs become better defined.

If remedial actions involving treatment are identified by the Respondents in the TM, or are identified by EPA prior to final approval of this TM, treatability studies may be required. Where treatability studies are needed, initial treatability testing activities (such as research and study design) should occur in a timely manner as to not impede the development of the Feasibility Study Work Plan.

These preliminary RAOs will be reevaluated in the FS Report, as additional site characterization data and information from the baseline risk assessment become available.

III. Develop Preliminary Remediation Goals (PRGs)

To support RI/FS activities, Respondents will develop PRGs for Site contaminants of potential concern. Respondents will meet with EPA technical representatives prior to initiating this task. The objective of these meetings will be to discuss application of EPA guidance and other appropriate benchmarks for PRGs. Respondents will develop PRGs based on the following objectives:

1. Protection of human health assuming direct contact with potentially contaminated environmental media or receptors at or from the Site, including soil, surface water, sediments and ground water, resulting from occupational activities, recreational use, transient use and other activities at the site, including fishing and swimming in Lake Washington, in which contact may occur.

2. Protection of benthic invertebrates, resident fish and piscivorous wildlife receptors, if any, that may be affected by potential water or sediment contamination in Lake Washington.

PRGs will be based on existing EPA guidance documents and other relevant published guidelines to the extent possible, and with respect to sediments will include consideration of nationally-developed and/or regionally-developed numerical sediment guidelines for the protection of benthic invertebrates. PRGs can be the basis for media- and contaminant-specific screening levels that can guide the iterative scope of the RI/FS.

IV. Identification (and initial prioritization) of data gaps for the RI, risk assessment and FS.

This analysis will include an assessment, related to a preliminary Conceptual Site Model (CSM), of data gaps identified from the review of all historic and current Quendall data. The data gaps assessment will include a summary of recommended studies (and supporting justification), as necessary, that is keyed to important CSM source(s), transport/fate mechanisms, exposure media and receptors (i.e., human, ecological).

Task 4 B Preliminary Classification of Remedial Alternatives and Technologies Technical Memorandum

Once the existing site information has been analyzed and a conceptual understanding of the site is obtained, a preliminary range of remedial action alternatives and associated technologies should be identified. This identification is not meant to be a detailed investigation of alternatives, instead it is a more general classification of potential remedial actions based upon the initially identified potential routes of exposure and associated receptors. The purpose of preliminary identification of alternatives and technologies, at this stage, is to allow initial identification of ARARs and to aid in identifying data needed to more fully evaluate alternatives and technologies in the future.

To the extent practicable, a preliminary list of broadly defined alternatives should be developed that reflects the goal of presenting a range of distinct, viable options. This list should include as appropriate a range of alternatives in which treatment that significantly reduces the toxicity, mobility, or volume of waste is a principle element; one or more alternatives that involve containment with little or no treatment; and a no-action alternative.

Task 5 B Information and Data Collection Work Plan

The purpose of this Task, if necessary, is to produce a Work Plan describing implementation of work efforts to fulfill information needs previously identified by EPA. This Work Plan shall provide a detailed description of the tasks to be performed, information needed for each task, information to be produced during and at the conclusion of each task, a description of the work products, and a schedule for implementation of the specified work.

If additional data collection is determined by EPA to be necessary, then Respondents shall submit a corresponding Work Plan (or Work Plans) including a Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) on the date specified by EPA for EPA review and approval. The Work Plan will include a detailed project schedule that will cover all tasks needed to implement the Work Plan. Respondents shall perform the work set forth in the approved Work Plan in accordance with the approved schedule.

Task 6 B Candidate Early Actions Technical Memorandum

This analysis will identify potential candidate early or interim actions for the Quendall site. The purpose of such actions are to implement source control, address "hot spots" and other actions that could be accomplished as a discrete action, compatible with the final remedy, in a more timely manner than the implementation of the final remedy. EPA believes that the following areas or substrates are appropriate for evaluation as potential candidates:

- $ "hot spot" chemical accumulations in sediments;
- $ storm water control;
- $ dense, non-aqueous phase liquids (DNAPL);
- $ potential spill sources along the shoreline or in the aquatic environment;
- $ Quendall Pond; and
- $ shoreline seeps and sheens.

The analysis shall include criteria used to select or reject candidates for early actions (the above and any other candidates identified).

Some of the factors to be considered in determining the appropriateness of an interim or early action are:

1. Actual or potential exposure to nearby human populations or ecological populations or the food chain from hazardous wastes or substances;
2. Actual or potential contamination of drinking water supplies or sensitive ecosystems;
3. Hazardous waste or substances in drums, barrels, tanks or other bulk storage containers that may pose a threat of release;
4. High levels of hazardous waste or substances in soils largely at or near the surface that may migrate;
5. Weather conditions that may cause hazardous waste or substances to migrate or be released; and
6. Other situations or factors that may pose threats to public health, welfare or the environment.

The Respondents shall meet with EPA to discuss the criteria to be used to evaluate the above candidate early or interim actions prior to commencing the evaluation. The Respondents shall utilize the criteria specified by EPA and the TM shall identify and discuss the criteria, and how the criteria were used to evaluate the various candidates and the results of that evaluation.

Task 7 -- Draft and Final Remedial Investigation

Respondents will prepare and submit draft and final RI Reports to EPA for review and approval. This report shall summarize results of sediment, surface water, groundwater, surface and subsurface soil and biota investigations and testing into a complete evaluation of the nature and extent of contamination at the Quendall site. The RI report will also include discussions of the preliminary conceptual site model, preliminary remedial action objectives, historical data, chemical fate and transport, and historical and on-going sources of contamination. Respondents will refer to EPA RI/FS guidance for an outline of the report format and required contents (EPA 1988).

Task 8 -- Draft and Final Baseline Ecological and Human Health Risk Assessment Work Plan

The Respondents will prepare a draft and final Baseline Ecological and Human Health Risk Assessment Work Plan that is consistent with the methods and procedures outlined in the Agency=s human and ecological risk assessment guidance documents for CERCLA. The Work Plan will outline the approach and methods for use in all screening and baseline risk assessments for human and ecological receptors. The Risk Assessment Work Plan will, at a minimum, identify the following:

I. Ecological Risk Assessment (ERA)

Problem Formulation
i. Site Physical Description and Setting
ii. Chemicals of Concern
iii. Data Types and Uses in ERA
iv. Ecological Receptors
v. General Assessment Endpoints and Measures
vi. Conceptual Site Model(s)
vii. Management Goals
viii. Analysis Plan (including proposed screening-level procedures)

Ecological Risk Assessment Methods
ix. Exposure Assessment (parameter values for species receptors)
x. Effects Characterization (toxicity reference values)

xi. Risk Characterization (uncertainty, site-specific and other lines of evidence to be used to support/refute risk).

II. Human Health Risk Assessment (HHRA)

i. Site Physical Setting
ii. Chemicals of Concern
iii. Data Types and Uses in HHRA
iv. Human Populations (and Subpopulations) of Concern
v. Conceptual Site Model
vi. Screening Procedures (PRGs, risk-based concentrations, background, etc.)
vii. Exposure Assessment Methods (Reasonable Maximum Exposure (RME), central tendency estimate (CTE), and parameter values, etc.)
viii. Toxicity Assessment Methods (RfDs, Slope Factors)
ix. Risk Characterization Methods (multi-chemical exposures, uncertainty, etc.)

Task 9 -- Draft and Final Baseline Ecological and Human Health Risk Assessment

Using existing data, the Respondents will prepare and submit a draft and final Baseline Ecological and Human Health Risk Assessment to EPA using the methods and procedures outlined in the Risk Assessment Work Plan (Task 8). The ecological risk assessment (ERA) should include the following components:

1. A conceptual site model; and
2. Identification of receptors of concern (ROC) (including results from all screening level assessments) and results from a site-specific benthic community survey;

Note: If existing benthic community data in the vicinity of the site are available and acceptable (quantity, relevance) to EPA, a site-specific benthic survey may not be required. However the determination for a site-specific benthic community survey will be made following review of the Summary of Existing Information and Data Quality Report prepared by the PRP. The latter report, should describe the quantity and quality of the existing benthic community survey data

available in Lake Washington, the locations of these data relative to Quendall, and the overall relevance of the data to the Quendall Site specifically.

3. Identification of chemicals of concern (COC) (including results of all screening);
4. An effects and exposure assessment for all COCs (includes all site-specific toxicity studies); and
5. Risk characterization and uncertainty assessment (including discussion of all lines of evidence outlined in the Risk Assessment Work Plan).

The human health risk assessment (HHRA) will also be conducted in accordance with the methods and procedures outlined in the Risk Assessment Work Plan (Task 8). The draft and final HHRA will include, but not be limited to, the following components:

1. A conceptual site model,
2. Identification of indirect and direct exposure routes (adults and children),
3. Identification of chemicals of concern (COC) (based on results of screening level risk assessment),
4. Toxicity assessment (RfDs, Cancer Slope Factors from EPA=s Integrated Risk Information System),
5. Quantification of contaminant exposures, and
6. Risk characterization and uncertainty assessment.

The HHRA will evaluate human health risks to adults and children from the Quendall Site contact/use of site sediments, surface water, ground water, soils, and fish/shellfish. The HHRA will include (at a minimum), with justification, the following scenarios: 1) tribal, 2) recreational, 3) resident, and 4) worker. The risk assessment will address risk to fish-consuming tribal individuals by applying EPA guidance on the subject.

Respondents will prepare and submit a draft and final Baseline Ecological and Human Health Risk Assessment to EPA for review and approval.

Task 10 B Draft and Final Development and Screening of Remedial Alternative Technical Memorandum

Alternatives for remediation are developed by assembling combinations of technologies, and the media to which they would be applied, into alternatives that address contamination on a site-wide basis or for an operable unit. The purpose of this step is to reduce the number of alternatives to be considered for detailed analysis in Task 11. This process consists of the following general steps which are described below.

$ Refine previously defined RAOs specifying the contaminants and media of concern, exposure pathways, preliminary remediation goals (PRGs) that permit a range of treatment and containment alternatives to be developed. The PRGs are developed on the basis of chemical-specific ARARs, when available, other available information (e.g., RfDs), and site-specific risk-related factors.

$ Develop general response actions for each medium of concern defining containment, treatment, excavation, pumping, or other actions, singly or in combination, which may be taken to satisfy the RAOs for the site.

- $ Identify volumes or areas of media to which general response actions might be applied, taking into account the requirements for protectiveness as identified in the RAOs and the chemical and physical characterization of the site.

- $ Identify and screen the technologies applicable to each general response action to ensure that only those technologies applicable to the contaminants present, their physical matrix, and other site characteristics will be considered. This screening will be based primarily on a technologies ability to effectively address the contaminants at the site, but will also take into account a technology=s implementability and cost. The general response actions are further defined to specify remedial technology types (e.g., the general response action of treatment can be further defined to include chemical or biological technology types).

- $ Combine potential technologies and process options into media-specific or site-wide alternatives. The developed alternatives should be defined with respect to size and configuration of the representative process options; time for remediation; rates of flow or treatment; spatial requirements; distances for disposal; and other factors necessary to evaluate the alternatives. These alternatives should be screened on a general basis with respect to their effectiveness, implementability, and cost.

As part of the screening process, alternatives are analyzed to investigate interactions among media in terms of both the evaluation of technologies (i.e., the extent to which source control influences the degree of groundwater control) and site-wide protectiveness (i.e., whether the alternative provides sufficient reduction of risk form each media and/or pathway of concern for the site or that part of the site being addresses by an operable unit). Areas and quantities of contaminated media initially specified in the general response actions may also be re-evaluated with respect to the effects of interactions between media (e.g., source control actions influence the degree or timeliness that groundwater remediation can be accomplished).

Respondents will develop and evaluate a array of appropriate alternatives that ensure protection of human health and the environment. The Respondents will screen and evaluate remedial alternatives in order to establish an appropriate array of remedial alternatives for the Quendall Site. This following list of alternatives will be evaluated (screened) and the methods/results documented in a Technical Memorandum (TM).

1. No action;
2. Natural recovery/enhanced natural recovery;
3. In-place confinement (capping);
4. In-situ containment;
5. In-situ stabilization;
6. Dredging with disposal in near shore and/or upland confined disposal facilities;
7. Excavation and/or dredging with disposal in existing landfills;
8. In-situ treatment;
9. Treatment of removed materials to reduce the toxicity, mobility, or volume of hazardous substances; and
10. Options combining aspects of these and/or other alternatives.

If additional testing, including treatability testing, beyond that performed to date is recommended or determined to be needed by EPA, Respondents will prepare the appropriate work plan for review and approval by EPA and the approved work plan will be subsequently implemented.

The analysis will include an alternatives array that will be modified by Respondents if required by EPA=s comments to assure identification of a complete and appropriate range of viable alternatives to be considered in the detailed analysis. This deliverable will document the methods, rationale, and results of the alternative screening process.

Task 11 B Draft and Final Feasibility Study

Respondents will prepare a draft FS report. The EPA approved FS Report will provide a basis for remedy selection by EPA and documents the development and detailed analysis of remedial alternatives. Respondents will refer to the RI/FS Guidance for an outline of the report format and the required report content (EPA 1988).

Within the FS, the Respondents will conduct a detailed analysis of the alternatives which will consist of an individual analysis of each alternative against the nine CERCLA evaluation criteria and a comparative analysis of all options against the evaluation criteria with respect to one another. The nine CERCLA evaluation criteria are:

1. Protective of human health and the environment;
2. Will be in compliance with, or include a waiver of, ARARs;
3. Will be cost-effective;
4. Will utilize permanent solutions and alternative treatment technologies, or resource recovery technologies, to the maximum extent practicable;
5. Will address the statutory preference for treatment as a principal element.

The evaluation criteria include:

1. Overall protection of human health and the environment
2. Compliance with ARARs
3. Long-term effectiveness and permanence
4. Reduction in toxicity, mobility, or volume
5. Short-term effectiveness
6. Implementability
7. Costs
8. State acceptance
9. Community acceptance.

Criteria 8 and 9 are considered after the RI/FS report has been released to the general public.

The individual analysis should include: (1) a technical description of each alternative that outlines the waste management strategy involved and identifies the key ARARs associated with each alternative; and (2) a discussion 6hat profiles the performance of that alterna6ive with respect to each of the evaluation criteria. A table summarizing the results of this analysis should be prepared. Once the individual analysis is complete, the alternative will be compared and contrasted to one another with respect to each of the evaluation criteria.

The detailed analysis of alternatives will be conducted by Respondents to provide EPA with the information needed to allow for the selection of remedies for the Quendall Site.

Task 12 - Community Involvement Activities

As requested by EPA, Respondents shall provide information supporting EPA=s community involvement programs related to the Work performed pursuant to this SOW, and shall participate in public meetings which may be held or sponsored by EPA to explain activities at or concerning Work performed to this SOW.

Upon request by EPA, Respondents shall submit copies of plans, technical memoranda, raw data, and other reports to EPA.

III. SCHEDULE FOR MAJOR DELIVERABLES

Consistent with the requirements of the AOC, all deliverables will be provided to EPA as follows:

Task #	Deliverable	Due Date to EPA
1	Draft Site Control and Access Plan	30 days after the effective date of the Settlement Agreement
2	Final Site Control and Access Plan	30 days after receipt of final comments from EPA
3	Draft Summary of Existing Information and Data Quality Report	60 days after the effective date of the Settlement Agreement
4	Final Summary of Existing Information and Data Quality Report	30 days after receipt of final comments from EPA
5	Draft Preliminary Conceptual Site Model, Preliminary Remedial Action Objectives, Preliminary Remediation Goals, and Data Gaps Technical Memorandum	60 days after EPA approves the Final Summary of Existing Information and Data Quality Report
6	Final Preliminary Conceptual Site Model, Preliminary Remedial Action Objectives, Preliminary Remediation Goals, and Data Gaps Technical Memorandum	30 days after receipt of final comments from EPA
7	Draft Preliminary Classification of Remedial Alternatives and Technologies Technical Memorandum	30 days after submittal of Final Preliminary Conceptual Site Model, Preliminary Remedial Action Objectives, Preliminary Remediation Goals, and Data Gaps Technical Memorandum
8	Final Preliminary Classification of Remedial Alternatives and Technologies Technical Memorandum	30 days after receipt of final comments from EPA
9	Draft Information and Data Collection Work Plan	as needed
10	Final Information and Data Collection Work Plan	30 days after receipt of final comments from EPA
11	Draft Candidate Early Actions Technical Memorandum	30 days after submittal of Final Preliminary Classification of Remedial Alternatives and Technologies Technical

		Memorandum
12	Final Candidate Early Actions Technical Memorandum	30 days after receipt of final comments from EPA
13	Draft Remedial Investigation	60 days after submittal of Final Preliminary Conceptual Site Model, Preliminary Remedial Action Objectives, Preliminary Remediation Goals, and Data Gaps Technical Memorandum or 60 days after receipt of validated data from implementation of Final Information and Data Collection Work Plan, whichever is later
14	Final Remedial Investigation	30 days after receipt of final comments from EPA
15	Draft Baseline Ecological and Human Health Risk Assessment Work Plan	60 days after receipt of final comments from EPA on the Draft Remedial Investigation
16	Final Baseline Ecological and Human Health Risk Assessment Work Plan	30 days after receipt of final comments from EPA
17	Draft Baseline Ecological and Human Health Risk Assessment	60 days after submittal of Final Baseline Ecological and Human Health Risk Assessment Work Plan
18	Final Baseline Ecological and Human Health Risk Assessment	30 days after receipt of final comments from EPA
19	Draft Remedial Alternatives Screening Technical Memorandum	30 days after submittal of Final Baseline Ecological and Human Health Risk Assessment
20	Final Remedial Alternatives Screening Technical Memorandum	30 days after receipt of final comments from EPA
21	Draft Feasibility Study	60 days after submittal of Final Remedial Alternatives Screening Technical Memorandum
22	Final Feasibility Study	30 days after receipt of final comments from EPA

The number and form (electronic and/or hardcopy) of each deliverable to be submitted to EPA will be determined by EPA prior to the date of submission. EPA will not require more than ten (10) hardcopy deliverables of each submittal. The Respondents shall request specific information on submittal requirements from EPA, which will be provided to the Respondents approximately 30 days prior to each submittal.

APPENDIX B

SITE MAP